



IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

UNITED STATES OF AMERICA,  
Plaintiff,

v.

\$43,000.00 in U.S. CURRENCY,  
Defendant.

: Civil No. 1:25MC 9  
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**MOTION FOR EXTENSION OF TIME TO FILE  
VERIFIED COMPLAINT OF FORFEITURE**

The United States of America, by and through Randall S. Galyon, Acting United States Attorney for the Middle District of North Carolina, and pursuant to 18 U.S.C. § 983(a)(3)(A), hereby respectfully moves the Court to extend, by approximately 60 days, the time within which to file a civil forfeiture complaint against the above-named property, seized on November 27, 2024, to and including August 4, 2025. The United States requests additional time for further investigation of the basis for forfeiture, and evaluation of the administrative claim.

Zhengtao Yang, whose claim in the administrative forfeiture action initiated against the above-named property, is represented by Eric A. Pack. On June 2, 2025, a paralegal for the U.S. Attorney's Office sent an email to the last known email address for Mr. Pack, requesting his consent for the requested extension. To date, no response has been received.

WHEREFORE, the United States of America respectfully requests that the Court grant an extension of time to file a civil forfeiture Complaint against the above-named property, from June 4, 2025, to and including August 4, 2025.

A proposed Order is attached.

This the 3<sup>rd</sup> day of June, 2025.

Respectfully submitted,

RANDALL S. GALYON  
Acting United States Attorney

/s/ Nathan L. Strup

Nathan L. Strup, Mo. Bar No. 60287  
Assistant United States Attorney  
Middle District of North Carolina  
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**CERTIFICATE OF SERVICE**

I hereby certify that on June 3, 2025, the foregoing document was filed with the Clerk of the Court, and I hereby certify that I have mailed and emailed the document to the following:

**Addressee:**

Eric A. Pack, Esq.  
21 Prospect Avenue  
Glen Cove, NY 11542  
*ericpack0401@gmail.com*  
*Attorney for Zhengtao Yang*

/s/ Nathan L. Strup  
Nathan L. Strup  
Assistant United States Attorney